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July 21, 1992

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HAND DELIVER

Donna R. Searcy  
Secretary  
Federal Communications Commission  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

ATTN: Allocations Branch, Mass Media Bureau

RE: Amendment of Section 73.202(b), Table of Allotments, FM  
Broadcast Stations (Hartford, Vermont), RM-7968, MM  
Docket No. 92-120

Dear Ms. Searcy:

Transmitted herewith, on behalf of Family Broadcasting, Inc., is an original and four (4) copies of an "Engineering Statement" which, through inadvertence, was not attached to the "Comments" filed in the above-referenced docketed proceeding yesterday.

The referenced engineering statement should be attached to the Comments following the page labelled "Technical Exhibit."

Family, and its undersigned counsel, regret any inconvenience to the Commission's staff caused by this error.

Should any questions arise concerning this matter, kindly contact the undersigned directly.

Respectfully submitted,

FAMILY BROADCASTING, INC.

By:

*Joseph E. Dunne III*  
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Attorney for Family Broadcast-  
ing, Inc.

JED:gmcB91  
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OFFICE OF THE SECRETARY

## ENGINEERING STATEMENT

The engineering data contained herein have been prepared on behalf of FAMILY BROADCASTING, INC., licensee of Radio Station WGLV(FM), Hartford, Vermont, in support of its comments to the Petition for Rulemaking RM-7968 seeking to upgrade the class of WGLV to C3 under MM Docket No. 92-120.

In the referenced Petition the FCC identifies an allocation area for the proposed Class C3 operation of WGLV, and assigns a set of reference coordinates which meet the mileage separation requirements to pertinent cochannel and adjacent-channel facilities. The reference coordinates are an assumed site. The original technical exhibit followed FCC policy in allocation matters and assumed uniform terrain. However, the Commission notes that, due to the significant terrain in the area, the reference site would require the construction of a tower providing 150-meters above average terrain in order to permit line-of-site service into the community of Hartford.

The proponent recognizes the fact that, from the reference site, there are terrain obstacles which prevent such line-of-site service into Hartford using realistic tower heights. However, the proponent reserves its right to assess any and all potential sites within the available allocation area at the time of the submission of its Application for Construction Permit. There are a plethora of sites within the present allocation area but that area is subject to change provided that pertinent

cochannel and adjacent-channel stations apply for and are granted site-change applications which might alter the area available for a WGLV class-change application.

Further, in order to address the viability of any given site, the proponent must submit applications for approval to the Federal Aviation Administration as well as state and local governing bodies. To require these entities to perform extensive viability studies on a tower at an arbitrary site such as the reference site would be a waste of time, energy, and money. Signal propagation analyses, such as knife-edge diffraction calculations, are also extremely expensive and are a waste of time and money if they are conducted based on a theoretical site.

To ensure compliance with Section 73.315, the proponent will follow a five-step plan to secure a suitable site, once the FCC authorizes the requested allocation:

- 1) Determine the best available site within the constraints of the allocation area as it exists at the time of application.

- 2) Perform terrain studies from that site to determine the tower height necessary to comply with Section 73.215 of the Rules.

- 3) Apply to the FAA as well as local and state authorities for necessary approval of the required tower.

- 4) If required by the above to do so, reduce the proposed tower height in order to comply with their requirements. In addition, proponent will perform signal propagation calculations in order to comply with the 70 dbu service requirement over Hartford.

5) If necessary, conduct signal propagation measurements per Section 73.215(d).

Using the above-stated methodology, the proponent will ensure that their ultimate upgrade application complies with the city-grade coverage requirements of Section 73.215 of the FCC's Rules.

I declare, under penalty of perjury, that the foregoing statements are true and correct to the best of my knowledge and belief.

A handwritten signature in black ink, appearing to read "Andrew R. Reiner". The signature is fluid and cursive, with a large initial "A" and "R".

ANDREW R. REINER

July 20, 1992